



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
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OCT 31 2016

Aaron Werner, AICP
City of New York
Department of Housing Preservation & Development
Office of Development – Building and Land Development Services
100 Gold Street, Rm 7-A4
New York, NY 10038

Dear Mr. Werner:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement (FEIS) for the Lambert Houses Redevelopment Project (CEQ# 20160216). The Department of Housing Preservation & Development of the City of New York prepared this document as the responsible entity consistent with the U.S. Department of Housing and Urban Development (HUD) delegation authorities.

The proposed project involves the demolition of the Lambert Houses buildings in the West Farms area of the Bronx, New York and redevelopment of the property with a combination of affordable housing, retail, and a possible school. The project would require approval by HUD for the reassignment of project-based rental assistance, and may also request HOME funds or other funding from HUD. The project intends to improve the quality of life for current Lambert Houses residents while increasing the number of affordable housing units on the Development Site. The site is currently underdeveloped, with less floor area than the current zoning districts allow and less density than the surrounding neighborhood. Current retail space is poorly designed with little to no street frontage and inadequate storage for merchants. The proposed project would increase the available housing by 934 units, would increase the available retail space to 61,000 square feet (sf), and would provide 86,608 sf of space for a possible new 500-seat elementary school. There would be a reduction of 110 parking spaces as a result of the project, as well as a decrease in open space from .10 acre to .04 acre on Parcel 10 as a result of the project.

The EIS notes that the project will result in a decrease of open space on Parcel 10 from .10 acre to .04 acre. To help offset the impact of this loss, the project will provide approximately 12,655 square feet of open rooftop space for residents on one of the buildings on Parcel 10. Your response to EPA's August 4, 2016 comments on the DEIS states that the open space amenities detailed in the DEIS "would help meet some of the residents' open space needs. Rooftop open spaces for use by building residents on Parcels 1, 3, and 5 are not proposed since there is sufficient space to provide at-grade open space amenities." Given the increasing demand for

open space that will result from the addition of over 900 new residential units, and that the residential study area has a total open space ratio of 0.571 acre per 1,000 residents (which is lower than the city's goal of 2.5 total acres of open space per 1,000 residents and below the citywide community district median of 1.5 acres per 1,000 residents), EPA continues to recommend that all of the new rooftops be made accessible to residents as open space, not just one building on Parcel 10. The dual benefits on increasing recreational space, while reducing impervious cover through green roof techniques would enhance quality of life for the residents while decreasing the environmental footprint of the project.

Our comments on the DEIS noted the value of including a Health Impact Assessment (HIA) and/or elements of an HIA be incorporated into your NEPA process and documented in the FEIS. Your response letter noted that the proposed project "is intended to improve the quality of life for current Lambert Houses residents while increasing the number of affordable housing units on the Development Site." It is also noted that you conducted community outreach with building residents in planning for the proposed project. Lastly, you state that "given the project's purpose of improving the quality of housing for Lambert Houses residents, a Health Impact Assessment is not proposed to be undertaken." EPA maintains that given the size and 13-year anticipated build out period of the proposed project, the health of the residents will be affected both directly and indirectly. While the long term outcome is expected to be beneficial, there may be adverse impacts during the construction phase, and even afterwards as the number of residences is increased, and open space decreases. EPA highly recommends that some level of HIA be conducted and documented in the ROD. Please contact us if you would like additional information on the topic.

The final EIS addresses our concerns as presented in our comment letter of September 3, 2015. This includes the goal of 75% waste diversion for management of construction waste and the inclusion of a general conformity analysis in the FEIS. However, EPA notes that on August 1, 2016 the Council of Environmental Quality released its "Final Guidance for Federal Departments and Agencies on the Consideration of Greenhouse Gas Emission and the Effects of Climate Change in the National Environmental Policy Act Reviews."

Thank you for the opportunity to comment on the FEIS for the Lambert Houses Redevelopment Project. If you have any questions, please contact Stephanie Lamster of my staff at (212) 637-3465 or at Lamster.stephanie@epa.gov.

Sincerely,



Judy-Ann Mitchell, Chief
Sustainability and Multimedia Programs Branch